
Purpose

The Nebraska WIC sanction system is to provide a consistent method of identifying, investigating, documenting, and assessing outcomes for abuse and fraud of the WIC Program.

An integral part of the Nebraska WIC sanction system will be the use of preventative education and follow up with clients, staff and vendors.

**Reports of Possible
Fraud and Abuse**

Reports of possible fraud or abuse of the program may be initiated/reported to the state or local agency by a number of means. The report may be in person, by letter, or by phone. Reports of abuse or fraud can come for WIC participants, vendors, citizens, WIC staff, or any other source and should all be documented and followed up appropriately, by local agency WIC staff.

**Summary of
Responsibilities**

Responsibilities of the WIC local agency and the State agency are provided in detail on pages 3, and 5, of this section. In general:

Local agencies are responsible for informing participants of actions, which may result in sanction points being assigned and/or disqualification from the program.

The responsibilities of the local agency include:

- λ informing participants of action which may result in sanction points being assigned and/or disqualification from the program,
- λ documentation of the action by completing the WIC Program integrity Screening Form, see Vol. I, Sec. P, pages 6b-c,
- λ gathering of supporting information,
- λ assessment of points,
- λ provision of written notification to the person(s) who the action affects,
- λ contact the State WIC office and forward any incidents or sanction point totals which may require disqualification
- λ education of clients.

The responsibilities of the state agency include:

- λ review of local agency documentation,
- λ gathering any additional information,
- λ determining action to take,
- λ implementing an alternate plan, when applicable, (i.e. proxy assignment),
- λ notification of disqualification.
 - Assessment of claims
 - Tracking of disqualified persons

	<ul style="list-style-type: none"> • Providing notification to local agencies of disqualified persons
Sanction Points	Points are assigned in the system depending on the severity of the action, with actions considered the least severe being assigned the smallest amount of points. Actions deemed to be more severe carry more points. Actions which are a result of intentional fraud or misrepresentation are seen as the most severe and result in immediate disqualification from the program. Actions which are a result of intentional fraud or misrepresentation are also assessed a claim for the value of the benefits received inappropriately.
Sanction System Consistency	The Nebraska WIC Participant Sanction System is designed to be consistent with the Vendor Sanction System. It is seen as a priority that the two systems are consistent in actions that are sanctionable, assignment of points, education provided, and which actions may result in disqualification from the program.
Sanction Documentation	To document and facilitate the review of all possible sanctionable occurrences the Program Integrity Screening Form and follow-up forms will be completed. See pages 6b-j for copies of the forms.
Education	Education is seen as an integral part of the sanction system. Education will be provided as a part of the mailed sanction letter. The education will help the client understand the rules for WIC participation and prevent repeat occurrences that may be due to lack of knowledge.
	For instances where the total accumulation of sanction points is 15 points, an in-person contact to provide education is recommended.
Retention	Sanctions which have been assigned will be a part of the record and will transfer with the record any time the record is transferred from one local agency to another. The sanction history will also transfer with the record.
Staff Training	The local agency is responsible for providing training to all staff on the WIC sanction system. This training should include what are sanctionable actions, documentation required, and what education/counseling is to be provided to clients for each sanctionable action.